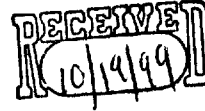




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October 13, 1999



The Office of Special Nutritionals (HFS-450)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
200 C. Street S.W.  
Washington, DC 20204

Dear Sir/Madam:

This is a notification pursuant to 21 U.S.C. 343(r)(6) that Standard Process Inc., Palmyra, Wisconsin 53156-0904, is making the following statements:

- (1) The nutrients in Niacinamide-B6 help support the cardiovascular, digestive, endocrine, circulatory, respiratory, and central nervous systems.\*
- (2) Niacinamide-B6 complex aids in the breakdown of proteins, fats, and carbohydrates.\*
- (3) The niacin portion of this product contains two important co-enzymes that are essential for metabolic processes in each cell of the body.\*

These statements are made for a dietary supplement containing a proprietary blend of bovine liver, porcine stomach, calcium lactate, soy (bean), bovine spleen, ovine spleen, defatted wheat (germ), potassium para-aminobenzoate, bovine brain, and ascorbic acid. Other ingredients include gelatin, niacinamide, water, pyridoxine hydrochloride, and natural colors. And the name of the product is Niacinamide B6.

The information contained herein is accurate and Standard Process Inc. has substantiation that the statements are truthful and not misleading.

Sincerely yours,

Ann Holden  
Standard Process Inc.

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